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March 19, 2014

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The Honorable Shelley C. Chapman  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

*Re: In re Lehman Brothers Holdings Inc., et al. – Case No. 08-13555 (SCC)*

Dear Judge Chapman:

This is the response of Lehman Brothers Holdings Inc. (“LBHI”) to the letter from Richard J. Schager to Your Honor, dated March 18, 2014 (the “Letter”). In the Letter, Claimants request that Messrs. Gran, Petrucelli, and de Jesus be permitted to testify telephonically at the evidentiary hearing scheduled to commence on April 1, 2014.

Although LBHI normally would request that witnesses testify in person, LBHI does not object to Claimants’ request under the circumstances of this particular matter. LBHI does not expect these witnesses to add, by their testimony, any material evidence that was not included already in the lengthy memoranda and declarations filed with the Bankruptcy Court. Indeed, LBHI firmly believes that the Court’s disposition of this matter will rest largely on legal, and not factual, issues. Moreover, LBHI notes that the witnesses’ credibility can be best assessed in person, and Claimants’ decision regarding the manner and form of their testimony should be afforded the appropriate weight and persuasiveness under the circumstances.

Respectfully Submitted,

/s/ Ralph I. Miller

Ralph I. Miller

cc: Richard J. Schager (by email)  
RSU Claimants (by email and mail)